

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law  
100 Lafayette Street, Suite 501  
New York, NY 10013

Franklin A. Rothman  
Jeremy Schneider  
Robert A. Soloway  
David Stern  
Rachel Perillo

Tel: (212) 571-5500  
Fax: (212) 571-5507

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BY ECF

Hon. Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: USA v. Paul Van Manen; 18 Cr. 030 (PAC)

Dear Judge Crotty:

I am assigned counsel for Paul Van Manen in connection with his 28 U.S.C. § 2255 motion, which is currently due January 16, 2023. I write without objection from the government, by AUSA Catherine Ghosh, to respectfully request an extension to and including February 17, 2023 to submit the motion, with the government response due March 17, 2023. As stated in the previous request, the draft motion has been delivered to Mr. Van Manen and we have acknowledgment of its receipt at the prison, and by my client personally. However, Mr. Van Manen has been in quarantine from late December through approximately one week ago, and I have been unable to meet with him. I have an appointment arranged with the prison for Saturday, January 21 (counsel visits occur on Saturday only), and, given the seriousness of the matter, and complexity of some of the issues, I continue to believe it is important to meet at his request to go over the briefing before it is filed. Additionally, I have been following the *pro se* filings Mr. Van Manen is making in the still active Rule 33 litigation before your Honor, and am aware of his desire to discuss some of those matters as well.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,

1/19/2023  
Extension granted.  
SO ORDERED.

*Robert A. Soloway*

Robert A. Soloway

RAS:sc

*Paul A. Crotty*